

1 Q. Well, do you know if there's any type of
2 encryption on the file from Merchants & Medical
3 to Hatteras?

4 A. Yes.

5 Q. Okay. So, I'm just trying to find out whatever
6 information you can provide me about the
7 encryption that is used.

8 A. SSH, SFTP.

9 Q. Okay. Is there any other information that you
10 have besides that?

11 A. No.

12 Q. Okay. And what happens with the file once it
13 is transmitted to Hatteras?

14 A. You would have to ask Hatteras.

15 Q. So Merchants & Medical doesn't know what
16 Hatteras does with the information after it's
17 transmitted to Hatteras?

18 MS. OLSON: Objection. Form and
19 foundation.

20 A. I don't know what their procedures are exactly.

21 Q. Is there anyone at Merchants & Medical who
22 would know what their procedures are?

23 A. Not to my knowledge.

24 Q. Is there any type of agreement with Hatteras
25 that would explain what Hatteras is or is not

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 A. Outside of their SOC sock audit, which we
17 review, which outlines the controls that they
18 have in place on protecting consumer
19 information, that is the information that we
20 have.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25 Q. How often are these SOC audits performed?

1 A. If I remember correctly, I believe they're
2 performed yearly.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Are you able to see the collection

8 letter?

9 A. Yes.

10 Q. Okay. So, on the top left-hand side underneath
11 the Merchants & Medical logo, there is a regard
12 line and it has your Kohl's credit card
13 account, a bunch of asterisks, and then 5078.

14 Do you see that?

15 A. Yes, I do.

16 Q. Okay. Is that line populated with information
17 sent by Merchants & Medical to Hatteras?

18 A. Which line? The line beginning R-E?

19 Q. Correct.

20 A. Yes, we send that.

21 Q. Okay. Do you also send the information that's
22 used to calculate a settlement offer? So, in
23 this case, there was a settlement offer of, it
24 says, 40 percent.

25 A. Yes, we send that.

1 Q. Okay. I see that this letter appears to be
2 from a Kathy Vickers at extension 412. Is that
3 information that is sent by Merchants & Medical
4 to Hatteras?

5 A. Yes.

6 Q. Okay. Do you know if that information, like
7 for instance Kathy Vickers, extension 412, is
8 specific to certain accounts or if that
9 information would appear on all the letters
10 that are sent by Hatteras?

11 A. Please allow me to clarify my statement.

12 Q. Of course.

13 A. I believe that this letter that Kathy Vickers
14 and the top part that says 40 percent off, pay
15 60 percent of your debt and it's resolved, I
16 believe all of that is simply part of our
17 template.

18 So I do not believe that each one of
19 those words is transmitted each time. It's
20 simply part of the template that they have on
21 file.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3 Did Ms. Moore ever give permission to
4 Merchants & Medical to disclose her information
5 to Hatteras?

6 MS. OLSON: Objection. Form.

7 A. I'm just reviewing the notes to see if we ever
8 had any communication with her outside of your
9 communication with her office.

10 No, I don't show that we had any
11 communication with Ms. Moore.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]